

Answer 11: This answer will be supplemented.

12. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Rick Gaston, Ryan Ted and Morgan Thompson had "final policy making authority, were aware of a habit, pattern, custom or policy of the use of intentional injurious excessive force against both prisoners, and more relevant to his action, pre-trial detainees, within the HCADC in direct violation of the federally mandated constitutional protections afforded citizens and other persons so incarcerated."

A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Rick Gaston, Ryan Ted and Morgan Thompson.

Answer 12: This answer will be supplemented.

13. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Rick Gaston, Ryan Ted and Morgan Thompson "used the lack of surveillance cameras in the shower to their advance in order to avoid video documentation of their most brutal, sadistic and savage uses of injuries excessive force" with respect to Plaintiff or other inmates at the HCADC

A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Rick Gaston, Ryan Teel and Morgan Thompson.

B. Please state each witness, including their name, telephone number and address, you intend to call that may testify that Rick Gaston, Ryan Ted

and Morgan Thompson "used the lack of surveillance cameras in the shower to their advance in order to avoid video documentation of their most brutal, sadistic and savage uses of injurics excessive force" with respect to Plaintiff or other inmates at the HCADC.

Answer 13: This answer will be supplemented.

14. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Rick Gaston "had personal knowledge and/or participation in the lack of proper supervision and training and [was] aware of the continuing misuse of force within the HCADC."

A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Rick Gaston.

Answer 14: This answer will be supplemented.

15. Identify and list each document and/or communication, whether oral or written, in support of your allegation that Morgan Thompson, Ryan Teel or Rick Gaston taunted and attempted to humiliate Plaintiff.

A. For each such document and/or communication, whether oral or written listed above, please describe with specificity how each document and/or communication relates specifically to Morgan Thompson, Rick Gaston and/or Ryan Ted.

B. Please state each witness, including their name, telephone number and address, you intend to call that may testify Morgan Thompson, Rick Gaston and/or Ryan Teel taunted and attempted to humiliate Plaintiff.

Answer 15: This answer will be supplemented.

16. For every category of actual damages to which you claim you are entitled in this lawsuit,

- (a) itemize and state the amount of each category of damages claimed;
- (b) describe in detail the methodology you employed in calculating the amount of each category of damages;
- (c) describe all facts upon which you rely in support of your damages claims;
- (d) identify all persons with knowledge of your alleged damages and provide a summary of each such person's knowledge; and
- (e) identify all documents supporting or relating to your damages claims.

Answer 16: This answer will be supplemented.

17. State all facts and/or opinions and identify all documents supporting your allegation that you are entitled to punitive or exemplary damages as against Rick Gaston, Ryan Teel and Morgan Thompson.

Answer 17: This answer will be supplemented.

18. If you contend that Rick Gaston, Ryan Ted and/or Morgan Thompson has made an admission that supports any of your allegations in this action:

- (a) identify the individual who made the admission;
- (b) state the date on which the admission was made;
- (c) identify all persons who were present when the admission was made; and
- (d) describe in detail the substance of the admission, including whether it was oral or in writing, and identify all documents that contain it or relate to it.

Answer 18: This answer will be supplemented.

19. Please describe any and all injuries you allege to have suffered as a result of the incident complained of in your Complaint, include in your description any and all medical, physiological, psychological, mental health, or other treatment you have received or continue to receive as a result of the incident, including the names and addresses of any and all physicians, hospitals, counselors, or other health care providers rendering treatment.
20. Please describe any medical condition from which you suffered prior to entering the HCADC at the time of the events complained of in the Complaint, including mental or emotional problems and any substance dependency.

Answer 20: This answer will be supplemented.

21. For each physician, psychiatrist or psychologist, medical practitioner, nurse, therapist, counselor, or other health care provider or professional from whom you have sought or received consultation, diagnosis, evaluation, or treatment in the past ten years, including for any mental or emotional problems:
 - (a) identify the provider or professional;
 - (b) state the dates on which you were seen;
 - (c) state the reason for each examination or consultation, *i.e.*, your chief complaint or symptom;
 - (d) state the diagnosis, prognosis and treatment given;
 - (e) identify all persons with knowledge relating to each consultation, diagnosis, evaluation, or treatment; and

- (f) identify all documents relating to the consultation, diagnosis, evaluation or treatment.

Answer 21: This answer will be supplemented.

22. For each time you have been hospitalized or otherwise treated in a healthcare and/or treatment facility (whether for inpatient or outpatient treatment) for any reason in the past ten years:

- (a) state the place of your hospitalization and/or treatment;
- (b) state the dates of your hospitalization and/or treatment;
- (c) state the reason for your hospitalization and/or treatment, i.e., your chief complaint or symptom;
- (d) state the discharge diagnosis and prognosis;
- (e) identify the treating physician and/or other professional healthcare provider;
- (f) identify all persons with knowledge relating to the hospitalization and/or treatment: and
- (g) identify all documents relating to the hospitalization and/or treatment.

Answer 22: This answer will be supplemented.

23. Have you ever sought, been requested to seek, been ordered to seek, or received treatment for alcohol, chemical, or other substance dependency or abuse? If your answer is in the affirmative: .

- (a) identify the physician, medical practitioner, nurse, therapist, or facility from who or from which treatment was sought, recommended, ordered, or received;